

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**Justin Van Pelt, et al.**

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**Plaintiffs**

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**v.**

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**Case No. 1:19-cv-00711-BPG**

**Giuseppe's, Inc., et al.**

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**Defendants**

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**DECLARATION OF JORDAN S. LIEW**

1. I, Jordan S. Liew, Esq., am at least 18 years of age and competent to testify, and I am not a party to, or related to a party, in this action. I am employed by Hoffman Employment Law, LLC, and serve as an associate to Howard B. Hoffman, counsel to the Plaintiffs in the above-referenced matter.
2. By way of brief background, I am an attorney in private practice, and I concentrate on employment law. I have been practicing law since 2016, after graduating from the Georgetown University Law Center. I am admitted to the Maryland bar (since 2016), the District of Columbia bar (since 2017), and was sworn into the bar of the U.S. District Court for the District of Maryland on June 22, 2018.
3. Prior to my employment with Hoffman Employment Law, LLC, I gained experience in employment law during my one-year tenure with the District of Columbia Office of Attorney General as a Charles F.C. Ruff Fellow. As an attorney with the Civil Litigation Division, I defended the District from claims of race, sex, and disability discrimination, hostile work environment, and retaliation. As an associate with Hoffman Employment Law, I now focus almost exclusively on employment law cases, primarily those concerning

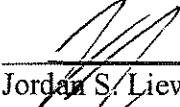
unpaid wage violations involving the FLSA and related state statutes.

4. My total time in this case, through July 8, 2019 was 7.2 hours. The total value of this time is \$1,476.00. Aside from the review of documents and communications, and the requisite conferences with Howard B. Hoffman, opposing counsel, and the Court, I worked on a couple more complex tasks during this case. In April of 2019, I drafted the Joint Stipulation of Material Fact regarding the issue of enterprise coverage. In May of 2019, I interviewed an additional Plaintiff to gather her factual allegations. I then subsequently drafted the Amended Complaint which plead her factual allegations and claims and added her to the lawsuit.
5. I have maintained time and costs records in this case, which I have placed into "RocketMatter"© software. The time records reflect actual time that I have expended in the prosecution of this litigation (the "RocketMatter" entries have not been placed into the Court's required lodestar billing format). I inputted my time promptly following work performed. To the fullest extent practical, I have specified the time spent per task, and I have avoided the practice of block billing.
6. The hourly rate claimed in this case, i.e., \$205/hour, is well within the range permitted by the U.S. District Court for the District of Maryland (Lodestar Guidelines). Magistrate Judge Charles B. Day approved my requested rate and observed it was "presumptively reasonable[.]" Dominguez v. Microfit Auto Parts, Inc. et al., 2019 WL 423403 at \* 6 n.4 (D. Md. Feb. 4, 2019). It is also supported by primary counsel on this matter, Howard B. Hoffman, Esq., whose Declaration is marked as Exhibit 3.

**DECLARANT FURTHER SAYETH NAUGHT**

I solemnly affirm under the penalties of perjury that the contents of the foregoing

declaration are true and correct.



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Jordan S. Liew, Esq.  
July 8, 2019